

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MEGAN VILLELLA, Individually and on
Behalf of All Others Similarly Situated, : Civil Action No. 1:15-cv-02106-ER-GWG
Plaintiff, : (Consolidated)
vs. :
: CLASS ACTION
CHEMICAL AND MINING COMPANY OF : LEAD PLAINTIFF'S NOTICE OF MOTION
CHILE INC., et al., : AND MOTION FOR FINAL APPROVAL OF
Defendants. : CLASS SETTLEMENT AND APPROVAL
: OF PLAN OF ALLOCATION
X

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Lead Plaintiff, the Council of the Borough of South Tyneside Acting in Its Capacity as the Administering Authority of the Tyne and Wear Pension Fund, on behalf of the Class, through counsel, will move this Court on April 2, 2021, at 10:00 a.m., before the Honorable Edgardo Ramos, for entry of orders and judgments, pursuant to Rule 23 of the Federal Rules of Civil Procedure: (1) granting final approval of the settlement; and (2) approving the proposed Plan of Allocation. This motion is based on: (i) the Memorandum of Law in Support of Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation; (ii) the Declaration of Aelish M. Baig in Support of: (1) Final Approval of Class Action Settlement; (2) Approval of Plan of Allocation; and (3) an Award of Attorneys' Fees and Expenses and an Award to Lead Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4); (iii) the Declaration of Ross D. Murray; (iv) the Declaration of Lead Plaintiff; (v) the Stipulation of Settlement; and (vi) all other proceedings herein.

Proposed orders will be submitted with Lead Plaintiff's reply submission on or before March 26, 2021.

DATED: February 26, 2021

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
DANIEL S. DROSMAN
ELLEN GUSIKOFF STEWART

s/ Ellen Gusikoff Stewart

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Lead Counsel for Plaintiff

CERTIFICATE OF SERVICE

I, Ellen Gusikoff Stewart, hereby certify that on February 26, 2021, I authorized a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such public filing to all counsel registered to received such notice.

/s/ Ellen Gusikoff Stewart

ELLEN GUSIKOFF STEWART